

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG DIVISION**

1789 FOUNDATION INC., d/b/a CITIZEN  
AG, and ANTHONY GOLEMBIEWSKI,

*Plaintiffs,*

v.

AL SCHMIDT, in his official capacity as  
Secretary of State, and COMMONWEALTH  
OF PENNSYLVANIA,

*Defendants.*

Case No. 3:24-cv-01865-RDM

**Hon. Robert D. Mariani**

**MOTION TO WITHDRAW AS COUNSEL OF RECORD**

Rachel L. Dreher of Dreher Law Group PLLC, counsel of record for Plaintiffs 1789 Foundation Inc., d/b/a Citizen AG and Anthony Golembiewski, respectfully requests permission to withdraw as counsel in the above-captioned matter because the Plaintiffs have retained Ronald David Coleman to represent them in this matter. Mr. Coleman's pro hac vice motion was granted on April 9, 2025.

Mr. Coleman was selected by the Plaintiffs to continue their representation in this matter. Thus, the Plaintiff clients are aware of the pendency of this motion, as it has been made at their request, and they will receive service of this motion upon its filing through their new counsel.

Mr. Coleman retains all case-related materials, and the client's decision to retain him ensures continued representation, this withdrawal will not cause any delay or prejudice to the procedures.

For these reasons, Rachel Dreher respectfully requests that the Court grant this motion, allowing her to withdraw as counsel of record and formally recognizing Ronald David Coleman as the attorney of record for the Plaintiffs.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of April 2025.

BY:

/s/ Rachel L. Dreher  
Rachel L. Dreher  
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*Attorney for Plaintiffs*

**Certificate of Rachel L. Dreher**

I hereby certify that beginning April 1, 2025, the Plaintiffs chose to retain Mr. Ronald David Coleman, to represent them. Whereas Ms. Dreher's services were no longer needed. The Plaintiff clients remain apprised of the status of the case through Mr. Ronald David Coleman and will be notified of the pendency of this motion upon service of this motion to the parties. This motion has been made upon the Plaintiffs' request.

BY:

/s/ Rachel L. Dreher  
Rachel L. Dreher

**Certificate of Service**

I hereby certify that on this 10<sup>th</sup> day of April 2025, I served a copy of this Motion to Withdraw as Counsel upon all interested parties registered to receive electronic filings via the Courts ECF system.

BY:

/s/ Rachel L. Dreher  
Rachel L. Dreher